

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO**

In re:) Case No. 19-40267-jpg
)
California Palms, LLC,)
) Chapter 11
Debtor.)
)
) Judge John P. Gustafson
)

**MOTION OF PENDER CAPITAL ASSET BASED LENDING FUND I, L.P. TO
EXTEND THE DEADLINE FOR RESPONSE TO THE MOTION
TO REJECT LEASE OR EXECUTORY CONTRACT [DOC. NO. 47]**

Pender Capital Asset Based Lending Fund I, L.P. (“Movant”) hereby respectfully moves this Court for an Order extending the time to respond to Debtor’s Motion to Reject Lease or Executory Contract [Doc No. 47] currently scheduled for hearing in the above-referenced bankruptcy case from Friday, May 3, 2019, to Friday, May 10, 2019, for the reasons set forth below:

1. Mr. Zellers, Debtor’s counsel, consents to the extension of time.
2. The extension would set the due date for the response to the same due date as for the Motion to Sell Property Free and Clear of Liens under Section 363(f) [Doc. No. 49].
3. The extension would permit initial settlement discussions to proceed.

WHEREFORE, Movant respectfully requests that this Court enter an order extending the time to respond to Debtor’s Motion to Reject Lease or Executory Contract to Friday, May 10, 2019. A proposed order has been submitted to the Court via its e-order upload.

Dated: May 2, 2019

Respectfully submitted,

/s/ Nancy A. Valentine

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*Attorneys for Pender Capital Asset Based
Lending Fund I, L.P.*

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2019, a true and correct copy of the foregoing *Motion of Pender Capital Asset Based Lending Fund I, L.P. to Extend the Deadline for Response to the Motion to Reject Lease or Executory Contract* [Doc No. 47] was served upon the following in the manner indicated:

Via the Court's Electronic Case Filing System:

Jeffrey Kurz jeffkurz@hotmail.com,
Sebastian Rucci SebRucci@gmail.com
Ronald A. Spinner spinner@millercanfield.com
United States Trustee (Registered address)@usdoj.gov
Nancy A. Valentine valentinenv@millercanfield.com, waldroup@millercanfield.com
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Richard G. Zellers zellersesq@gmail.com

and by first-class, U.S. mail, postage prepaid, on the following as listed on the Debtor's list of its 20 largest unsecured claims:

Hypercore P.O. Box 840964 Dallas, TX 75284-0964	Law Office of Jeff Kurz 42 N. Phelps Street Youngstown, OH 44503-1130	Vonage Business 3200 Windy Hill Rd, St 200 East Atlanta, GA 30339-5640
AT&T P.O. Box 5019 Carol Stream, IL 60197-5019	Law Off Robert Schuerger 81 S. 5th Street, Suite 400 Columbus, OH 43215-4323	Ohio Edison 76 S. Main Street Akron, OH 44308-1817
Youngstown Water Dept. P.O. Box 6219 Youngstown, OH 44501-6219	Dominion Energy P.O. Box 26785 Richmond, VA 23261-6785	Law Office of James Vitullo 5232 Nashua Drive Austintown, OH 44515-5122
Ohio Bureau of Workers' Compensation Legal Division/Bankruptcy Unit PO Box 15567 Columbus, OH 43215-0567	Ohio Edison 5001 NASA Blvd Fairmont WV 26554	

/s/ Nancy A. Valentine

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*One of the Attorneys for Pender Capital Asset
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